

1 Law Office of Mark McClure, PS
2 1103 West Meeker Street, #101
3 Kent, WA 98032

The Honorable Brian D Lynch
Chapter 11

5 UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF
6 WASHINGTON AT TACOMA

7 In Re,

8 Stephen Robert Brown,
9 Debtor.

Case No.: 22-40997-BDL

10 DECLARATION OF DEBTORS'
11 ATTORNEY MARK MCCLURE IN
12 SUPPORT OF APPLICATION FOR
13 EMPLOYMENT

14 Mark McClure, states under penalty of perjury of the laws of the State of Washington:

- 15 1. I am an attorney at law, duly admitted to practice in the state of Washington and in the
16 United States District Court for the Western District of Washington. I have personal
17 knowledge of the facts set forth herein and competent to testify to the same.
18
- 19 2. To the best of knowledge of the undersigned, I or the Law Office of Mark McClure, PS,
20 presently have a connection nor business dealing with the Debtor, creditor, any party in
21 interest, their respective attorneys and accountants. Mr. Iwama, presently an attorney of
22 the Law Office of Mark McClure, PS is filing a contemporaneous declaration regarding
23 the involvement of his old law firm, Iwama Harper PLLC and its involvement as a
24 Trustee for the Deed of Trust identified below and the subsequent assignment of that
25 responsibility.
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3. To the best of my knowledge, neither I nor employees of the Law Office of Mark McClure, PS hold any interest adverse to the estate.
 4. Other attorneys that are employees of Law Office of Mark McClure, PS who may work on this matter include Masafumi Iwama and Ian Hatch. Any reference to "Iwama" in the Fee Agreement is a scrivener's error and should be interpreted as the Law Office of Mark McClure, PS.
 5. Neither I nor employees of the Law Office of Mark McClure, PS are pre-petition creditors or have a security interest in the property of the estate to secure fees.
 6. I believe I am disinterested for purposes of § 104 (14) of the Bankruptcy Code.
 7. I have reviewed Local BR 2016 and I am familiar with same.
 8. Initial Retainer was received from Stephen Robert Brown, the debtor on this matter on or about August 9, 2022. Debtor took a loan against his home in the amount of \$500,000 and additional retainer was received on August 10, 2022 and credited against the account on August 11, 2022 prior to the filing of the matter. After payment of pre-petition fees and the filing fee, there remains a balance of \$494,641.70 in counsel's IOLTA account and these funds have been identified in Schedule A/B as an asset of the estate.
 9. We are employed as general counsel under 11 U.S.C 327(a).
 10. A copy of my Engagement Agreement, Application for Employment and Declaration were forwarded to the U.S. Trustee's office on September 2, 2022.

/s/ Mark C. McClure
Mark C. McClure, WSBA #24393
Attorney for Debtors

**DECLARATION OF DEBTORS'
ATTORNEY IN SUPPORT OF
APPLICATION FOR EMPLOYMENT**

**Law Office of Mark McClure, P.S.
1103 W Meeker St, Ste 101
Kent, WA 98032**